

EXHIBIT 2

REDACTED

From: Smith, Ivan D. <idsmith@seyfarth.com>
Sent: Friday, April 26, 2024 7:11 PM
To: Michael J. Willemine <mwillemine@wigdorlaw.com>
Cc: Stampp, Maureen M. <mstampp@seyfarth.com>
Subject: RE: Puris/TikTok/ByteDance

Michael,

I tried to call you. Please give me a call at **REDACTED**. Please be advised that I am in the process of representing all of the defendants in this action, Therefore, please do not reach out to any corporate defendants, Lidong Zhang or any individuals employed by any corporate defendants without my express permission.

Ivan D. Smith | Partner | Seyfarth Shaw LLP
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From: Michael J. Willemin <mwillemin@wigdorlaw.com>
Sent: Friday, April 26, 2024 6:01 PM
To: Smith, Ivan D. <idsmith@seyfarth.com>
Subject: RE: Puris/TikTok/ByteDance

Ivan,

REDACTED

REDACTED

Finally, as you likely know, BDL is in default. As I am sure you would not let a client default, I assume that you do not represent that entity. However, I want to make sure that all of the relevant individuals employed by ByteDance are given an opportunity to participate in a potential resolution of this matter. As such, please confirm that BDL executives Lidong Zhang, Rubo Liang and Yiming Zhang are aware of these ongoing discussions. If I do not have that confirmation tonight (or hear from a lawyer representing them), I will communicate directly with them about this matter.

Thanks,

Michael J. Willemin

Partner

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New York, NY 10003

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